

HD TANDDEM
David Erickson, President
4300 Pacific Coast Highway
Long Beach, CA 90804

May 30, 2017

VIA ECFS

Notice of Ex Parte

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Petition of AT&T Services, Inc. For Forbearance Under 47 U.S.C. § 160(c)
From Enforcement Of Certain Rules For Switched Access Services And Toll Free
Database Dip Charges; WC Docket No. 16-363**

Dear Secretary Dortch:

On May 25, 2017, the undersigned and Josh Lowenthal and Kathryn Glaser of HD Tandem, along with Megan Delany, Principal, Dentons, met with Pamela Arluk, Gregory Capobianco, Victoria Goldberg, Lisa Hone, William Kehoe, Edward Krachmer, Emily Lentz, Alexandra Mays, and Gil Strobel, as well as Irina Asokov and Douglas Slotten via teleconference, of the Wireline Competition Bureau, regarding the above-referenced proceeding.

During the meeting, we explained that forbearance was not the appropriate vehicle for addressing the issues that AT&T raised, and that the Commission should issue a decision that AT&T's Petition for Forbearance fails to meet the standards for forbearance under Section 10(a) of the Communications Act of 1934, as amended. We discussed the essential role that intermediate carriers like HD Tandem play in the delivery of traffic and that all intermediate carriers should be treated equally and on a level economic playing field, regardless of traffic type. Creating differing economic treatment of traffic based on type will only create more marketplace and regulatory uncertainty and confusion. Specifically, granting the Petition for Forbearance would result in unanswered questions as to whether intermediate carriers without end users from whom to recover the cost of service would be required to accept and deliver detariffed traffic. As a result, we explained that a broader discussion regarding the role

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of all intermediate carriers and the appropriate rules governing the exchange of all traffic was needed.

Please contact the undersigned if you have any questions regarding this submission.

Respectfully submitted,

/s/ David Erickson

David Erickson

cc: Pamela Arluk
Irina Asokov
Gregory Capobianco
Victoria Goldberg
Lisa Hone
William Kehoe
Edward Krachmer
Emily Lentz
Alexandra Mays
Douglas Slotten
Gil Strobel